

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: Bair Hugger Forced Air Warming
Products Liability Litigation

MDL Docket No. 15-2666 (JNE/DTS)
Case No. 0:16-cv-03293-JNE-DTS

This Document Relates to:

**BONNIE WIREMAN
and
CLAYTON WIREMAN**

VS.

**3M COMPANY AND ARIZANT
HEALTHCARE, INC.**

**DECLARATION OF
JENNIFER A. MOORE IN SUPPORT
OF PLAINTIFFS' RESPONSE IN
OPPOSITION TO DEFENDANTS'
MOTION TO DISMISS**

I, Jennifer A. Moore, declare as follows:

1. I am an attorney at Moore Law Group, PLLC and counsel for Plaintiffs Bonnie and Clayton Wireman in the above-captioned case.
2. I submit this declaration in support of Plaintiffs' Response In Opposition To Defendants' Motion To Dismiss.
3. Plaintiffs' lawsuit was filed on September 29, 2016 in accordance with the applicable statute of limitations and after review of relevant medical and billing records confirmed use of the Bair Hugger Forced Air Warming System and corresponding injury.
4. Plaintiffs completed the Plaintiff Fact Sheet and timely served it upon Defendants on December 28, 2016. Defendants did not identify any deficiencies with respect to the Plaintiff Fact Sheet.

5. My law firm utilizes a system to maintain routine contact with clients involved in multi-district litigation even where all discovery obligations have been met and the case is not included in a bellwether pool.

6. Ms. Wireman passed away right in the holiday season on November 25, 2018, leaving behind her husband, Clayton Wireman. Understandably, Mr. Wireman has been grieving the loss of his spouse of almost 51 years.

7. Plaintiffs' counsel did not learn of Ms. Wireman's passing until April 9, 2019, slightly more than 90 days after Ms. Wireman's passing.

8. Plaintiffs' counsel filed a Suggestion of Death in good faith the following day, on April 10, 2019, after speaking with Mr. Wireman and confirming Ms. Wireman's passing.

9. Mr. Wireman is in the process of filing the appropriate estate documents in Kentucky state court.

Pursuant to 28 U.S.C. 1746(2), I declare under the penalty of perjury that the foregoing is true and correct.

Dated: May 2, 2019

Respectfully submitted,

/s/ Jennifer A. Moore

Jennifer A. Moore

Counsel for Plaintiffs